

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

HOUSSAM ELACHKAR,

Plaintiff,

-against-

No. 19-CV-2172 (CBA)(ST)

CITY OF NEW YORK, NEW YORK CITY
TRANSIT AUTHORITY,
METROPOLITAN TRANSPORTATION
AUTHORITY, MARIARIT ACQUISTA,
Individually, JEAN LORMESTIL,
Individually, and JOHN DOE 1 through 4,
Individually, (the names John Doe being
fictitious, as the true names are presently
unknown),

Defendants.

**Declaration of Outgoing Counsel Brian L. Bromberg in Support of
Motion for Lien for Costs and Disbursements on any Recovery**

Under 28 U.S.C. § 1746, I, Brian L. Bromberg, do hereby declare under penalty of perjury, that the following is true and correct:

1. I am a principal of the Bromberg Law Office, P.C.
2. I am submitting this Declaration in of my request for a lien against any recovery in this case in the amount of my costs and disbursements, which total \$1,523.22.
3. First, my office paid \$400 to file the complaint.

4. Second, my office paid \$379 to Capital Process Service to make service on all of the defendants. I am attaching copies of the billing statement showing payment in full as Exhibit A.

5. Third, my office owes \$605.25 to Hill & Moin LLP, the law firm that obtained Mr. Elachkar's hospital records at his direction for the period following the incident at issue here. I have printed out and sent a hard copy of these 807 pages in records to Mr. Elachkar. I am attaching the invoice for the medical records as Exhibit B.

6. Finally, Mr. Elachkar owes my office for extensive use of Federal Express courier services, because he cannot receive mail at his address when it is sent by the U.S. Postal Service. I am attaching the records of the \$138.97 in bills I paid to Federal Express. I am attaching these billing records as Exhibit C.

7. Because Mr. Elachkar cannot receive documents by U.S. mail, I am sending this to him by Federal Express standard overnight delivery.

Under 28 U.S.C. § 1746, I, Brian L. Bromberg, do hereby certify under penalties of perjury, that the above statements are true and correct to the extent they reflect my personal knowledge and otherwise are based upon my information and belief.

Dated: New York, New York
October 22, 2019

/s/ Brian L. Bromberg
Brian L. Bromberg